NODE4

Modern Slavery and Human Trafficking Statement

26/02/2026 Node4 Limited

INTERNAL USE ONLY

Slavery and Human Trafficking statement

Since the implementation of the Modern Slavery Act 2015 the UK has seen public examples of UK businesses complicit in human rights abuses. Within this statement, we describe the steps taken by Node4 to address human rights and modern slavery within our supply chain.

Organisation Overview and Structure

Node4, launched in 2003 has rapidly grown, providing comprehensive IT and communication solutions to businesses. Upholding the UN Guiding Principles on Business and Human Rights, we respect human rights across our operations and supply chain.

Our operations include 918 employees, a revenue of £183,000,000, and 415 active suppliers with a spend of £71,350,729.20in the last 12 months.

Our services encompass:

- Cloud Services: Including public, private and hybrid cloud hosting.
- Data Centre Services: Including colocation services, disaster recovery, and business continuity solutions.
- Connectivity: Including broadband, leased lines, and MPLS networks.
- Communication and Collaboration: Including unified communications solutions, VoIP and collaboration tools.
- Managed Services: Including IT support, network management, and cybersecurity services.
- Professional Services: Including consultancy and project management services.

We remain committed to respecting and upholding the human rights of all individuals we interact with, directly or indirectly, in alignment with the United Nations Guiding Principles

Policies and Governance

Since 2017, Node4 has implemented a Slavery and Human Trafficking Policy, reflecting our commitment to ethical conduct and integrity in all our business relationships, with the aim to prevent or mitigate any incidents of slavery and human trafficking in our operations. This statement, endorsed by our Executive Board, outlines our approach to human rights, encompassing company policy, due diligence, training and awareness, risk assessment, supply chain management, corporate social responsibility, and compliance.

Our operational procurement primarily involves services delivered to our offices, such as security, cleaning, catering, and maintenance, as well as the procurement of IT services, software, and hardware, enabling us to offer a wide array of IT services to our customers. Our 'Supplier Onboarding Process' outlines Node4's expectations for our

suppliers, requiring them to comply with the law and to ensure that their employees, suppliers, and other third parties.

Objectives and Measures

Objectives

Strengthen employee awareness and capability to prevent modern slavery
We will ensure all employees understand their responsibilities in identifying, preventing, and escalating concerns related to modern slavery. This includes providing mandatory training to all staff and ensuring new employees complete the training shortly after joining.

Maintain clear, accessible, and trusted reporting channels
We will support a culture of openness by maintaining accessible mechanisms for employees, contractors, and suppliers to report concerns in confidence. We will ensure that all reports are responded to promptly and appropriately.

Embed modern slavery considerations into supplier engagement and management
We will work with our suppliers to ensure they understand, meet, and uphold our expectations relating to human rights and modern slavery. This includes integrating risk based due diligence and ongoing monitoring into our supplier lifecycle processes.

Ensure our policies and governance remain aligned with best practice and legal requirements
We will regularly review and update our internal policies, procedures, and control frameworks to ensure they reflect current legislation, regulatory expectations, and industry best practice.

Measures

Training and Awareness

- Percentage of employees who complete modern slavery training each year.
- Percentage of new starters completing training within their first 30 days.

Reporting and Incident Management

- Number of concerns raised through internal or supplier reporting channels.
- Percentage of reported incidents investigated and closed within 30 days.

Supplier Engagement and Compliance

- Percentage of suppliers assessed for modern slavery risk during onboarding.
- Percentage of high-risk suppliers completing enhanced due-diligence checks.
- Percentage of suppliers acknowledging compliance with Node4's human-rights and modern slavery requirements.

Due Diligence

Node4 communicates our expectations to employees and suppliers that Slavery and Human Trafficking is an unacceptable practice within our supply chain.

Our principal asset is our people, and we have, therefore, created a working environment that is safe, fair, inclusive and seeks to support their wellbeing and learning.

We seek to minimise the risk of human rights infringements in our supply chain by carefully evaluating suppliers and their commitment and due diligence to ensure that they also comply with the law during the 'Supplier Onboarding Process' and ad-hoc supplier audits.

Risk Assessment and Management

Node4 has a risk-based methodology in place to check whether its suppliers comply with The Modern Slavery Act.

Human rights and modern slavery risks are assessed as low given the nature of our 'well known' supplier base and industry sectors they operate in, and our focus on the UK market where risks for UK employees are lower given the national legislative context and the robust policies and processes, we have in place throughout our business. Nevertheless, we recognise that specific jobs may be more vulnerable and as such due diligence should be carried out by Node4 during the 'Supplier Onboarding Process'.

The procurement of IT goods and services is with suppliers that are 'well-known' and have strong ethical, corporate, and social responsibility. Due Diligence has been completed by the Compliance Team to ensure that Node4 comply with the law and have adequate measures in place to uphold human rights.

Training

The delivery of our human rights and modern slavery program is dependent on key personnel having a good understanding of the key issues, the legislative requirements of our business and our approach to risk identification and management.

To ensure a comprehensive understanding of the risks of modern slavery and human trafficking, we require all our employees to affirm their understanding of Node4's company values, including our firm stance that slavery and human trafficking are unacceptable in our business. We provide training to all employees on these issues, ensuring that this important information is included in the induction process for new starters. A record of this awareness and training is maintained for all employees as part of our commitment to transparency and accountability.

Effectiveness of KPI's

We assess the effectiveness of our modern slavery approach through a set of defined KPIs covering training, reporting, supplier engagement, and governance. Training completion rates help us ensure employees understand their responsibilities, while incident related metrics demonstrate the accessibility and responsiveness of our reporting channels.

Supplier focused KPIs enable us to monitor due diligence activities and ensure our expectations are understood across our supply chain. Regular policy reviews and tracked improvements provide assurance that our controls remain aligned with legal requirements and best practice.

Together, these KPIs give us a clear and measurable view of how well we are managing modern slavery risks across our organisation and supply chain.

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